

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI,

Plaintiff,

-against-

AMERICAN AIRLINES GROUP, INC., et al.,

Defendants.

23 Civ. 04033 (LJL) (JLC)

**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the Complaint, the accompanying Declaration of Ma. Clara C. De Castro including exhibits, the accompanying Declaration of Yeontaek Kim including exhibits, and the accompanying Memorandum of Law, Defendants Philippine Airlines, Inc. and Asiana Airlines, Inc. will move this Court before the Honorable Lewis J. Liman, at the United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, New York, as soon as counsel may be heard, for an order pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure dismissing the Complaint for lack of Article III subject matter jurisdiction.

PLEASE TAKE FURTHER NOTICE that, upon the Complaint and the accompanying Memorandum of Law, Defendants Philippines Airlines, Inc. and Asiana Airlines, Inc. will move this Court before the Honorable Lewis J. Liman, at the United States Courthouse, 500 Pearl Street, Courtroom 15C, New York, New York, as soon as counsel may be heard, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint for failure to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that pursuant to the portion of Rule 2.K. of the Court's Individual Practices in Civil Cases related to *pro se* cases, any papers filed in opposition to these motions must be served and filed by no later than February 6, 2024.

Dated: New York, New York  
January 9, 2024

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